## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WARDELL BRIGHT		)
	Plaintiff,	) NO. 07 C 7197
V.		) HON. JUDGE ZAGEL ) Judge Presiding
R. MELONDEZ, and		)
R. CORONA,		) MAGISTRATE JUDGE BROWN
		)
	Defendants	)

## DEFENDANTS MOTION FOR ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD

Defendants, Ramon Melendez and Rodrigo Corona("Defendants"), by one of their attorneys, Thomas H. Freitag, Assistant Corporation Counsel of the City of Chicago, respectfully request this Honorable Court, pursuant to FRCP 6(b)(1), to enlarge their respective times to answer or otherwise plead to Plaintiff's Complaint in this matter thirty (30) days from today's date, up to and including May 22nd, 2008.

In support of this motion, the undersigned state as follows:

- 1. I, the undersigned Thomas H. Freitag, am one of the Assistant Corporation Counsel of the City of Chicago assigned to represent the Defendants in this matter.
- 2. Due to the recent service of Summons and Plaintiff's Pro Se Complaint upon Defendants on April 2 and April 4, 2007, respectively, it was only in the last week that the Individual Defense Litigation Division was first able to learn of the completed service on Defendants.
- 3. We therefore have not had a chance to discuss the allegations contained in Plaintiff's Complaint with our clients in order to adequately answer or otherwise plead in this

matter on their behalves. Answering on behalf of all Defendants at the same time will provide uniform briefing schedules as well as improved efficiencies for the Court.

- 4. We are therefore requesting a thirty (30) day enlargement of time from today, April 22nd, 2008, to answer or otherwise plead for the served Defendants, up to and including May 22nd, 2008.
- 5. Plaintiff has not been prejudiced by the delay in responding to his Complaint since the time service was had, and will not be prejudiced by the granting of this motion.
- 6. This motion is filed in good faith, and is not intended for the purpose of undue delay.

WHEREFORE, Defendants respectfully move this Honorable Court to enlarge their respective time thirty (30) days from today, up to and including May 22nd, 2008, to answer or otherwise plead in this matter.

Respectfully submitted,

Ramon Melendez and Rodrigo Corona By one of their attorneys,

30 North LaSalle Street, Suite 1400 Chicago, Illinois 60602 (312) 742-7391 Atty. No. 6272245

/s/ Thomas H. Freitag
Thomas H. Freitag
Assistant Corporation Counsel